IN THE UNITED DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA)
Plaintiff,)
)
v.) Case No.: 2:19-cr-00013
GEORGIANNA A.M. GIAMPIETRO Defendant.) Chief Judge Waverly D. Crenshaw, Jr.)

DEFENDANT'S WITNESS LIST AND SUMMARIES FOR SENTENCING

The defendant, Georgianna Giampietro, through undersigned counsel, submits the following witnesses for testimony during sentencing.

1. Richard Connor

Mr. Connor will offer testimony about Telegram, how Telegram's secret chat feature operates, the undercover and defendant's use of the secret chat feature. He will offer testimony about the alleged deletions from Ms. Giampietro's devices, including addressing whether any "factory reset" was ever performed on her devices. Mr. Connor 's testimony will address factual disputes relevant to the PSR's application of the enhancement for obstruction of justice (U.S.S.G. § 3C1.1).

2. Aymen Al-Jawad

Mr. Jawad will offer testimony regarding the lack of a factual basis for application of the terrorism enhancement (U.S.S.G. § 3A4.1). He is expected to testify that there is no evidence to connect Hayat Tahrir Al-Sham (HTS) to Merciful Hands, the charity that Ms. Giampietro donated to. Mr. Jawad will also testify that the Telegram account "@AlSadaqahSyria", also known as Individual A, was raising funds via Bitcoin during June 2018. Finally, Mr. Jawad will

offer testimony about Ms. Giampietro's statements during the offense conduct regarding her lack

of support for HTS and religious views.

3. Maria Williams

Ms. Williams is Ms. Giampietro's mother and will offer testimony about Ms. Giampietro's

peaceful and non-violent nature, her character and personal characteristics.

4. Lori Chaney

Ms. Chaney is a master social worker who worked with Ms. Giampietro at her last place of

employment, a mental health agency. Ms. Chaney will offer testimony about Ms. Giampietro's

work at Ten Broek, Ms. Giampietro's recent licensure as a master social worker shorty before

her arrest, her character and peaceful/non-dangerous nature.

Respectfully submitted this 6th day of May, 2022,

By: <u>/s/ Charles Swift</u>

Charles D. Swift,

Pro Hac Attorney for Giampietro

CLCMA

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of May, 2022, I electronically filed the foregoing

Defendant's Witness List and Summaries for Sentencing with the Clerk of the Court using the

CM/ECF system which will send a notice of electronic filing to all counsel of record.

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By: /s/ Charles Swift
Charles D. Swift, Pro Hac
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